

CLERK'S OFFICE U.S. DISTRICT COURT
AT ROANOKE, VA
FILED

JUL 26 2024

LAURA A. AUSTIN, CLERK
BY: *[Signature]*
DEPUTY CLERKIN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Roanoke DIVISIONKenneth J. Brown

Plaintiff(s),

v.

South west Virginia
Regional Jail et al.,

Defendant(s).

(Enter the full name(s) of ALL parties in this lawsuit.
Please attach additional sheets if necessary).Civil Action No.: 7:24cv00461
(To be assigned by Clerk of District Court)COMPLAINT

PARTIES

1. List all Plaintiffs. State the full name of the Plaintiff, address and telephone number.
-
- Do the same for any additional Plaintiffs.

a. Plaintiff No. 1

Name:

Kenneth J Brown

Address:

SWVRJ 1037 Bear Trail Rd Duffield Va 24244

Telephone Number: _____

b. Plaintiff No. 2

Name: _____

Address: _____

Telephone Number: _____

2. List all Defendants. State the full name of the Defendant, even if that Defendant is a government agency, an organization, a corporation, or an individual. Include the address where each Defendant may be served. Make sure that the Defendant(s) listed below are identical to those contained in the above caption of the complaint.

a. Defendant No. 1

Name:

Dr Shah

Address:

SWVRS 1037 Boon Trail Rd Duffield Va 24244

b. Defendant No. 2

Name:

Dr Shah nurses mental health Jil

Address:

SWVRS 1037 Boon Trail Rd Duffield Va 24244

NOTE: IF THERE ARE ADDITIONAL PLAINTIFFS OR DEFENDANTS, PLEASE PROVIDE THEIR NAMES AND ADDRESSES ON A SEPARATE SHEET OF PAPER.

Check here if additional sheets of paper are attached: ☒

Please label the attached sheets of paper to correspond to the appropriate numbered paragraph above (e.g. Additional Defendants 2.c., 2.d., etc.).

JURISDICTION

Federal courts are courts of limited jurisdiction. Generally, two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount of damages is more than \$75,000 is a diversity of citizenship case. Federal courts also have jurisdiction over cases where the United States is a Defendant.

3. What is the basis for federal court jurisdiction?

☒ Federal Question

☒ Diversity of Citizenship

☐ Government Defendant

4. If the basis for jurisdiction is Federal Question, which Federal Constitution, statutory or treaty right is at issue? List all that apply.

My Right to Decent Conditions in Prison
my right to medical care
Deliberate Indifference By Dr Shah

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C. Defendant No. 3 ~~NA~~

Name. Nurse ADDington

ADDRESSES. SWVRS 1037 Boontrail Rd
Duffield Va 24244

D. Defendant No. 4

Name. Nurse. Carroll

Address. SWVRS 1037 Boontrail Rd
Duffield Va 24244

E. Defendant No. 5

Name. ~~6.695~~ Nurse 6.695

Address. SWVRS 1037 Boontrail Rd
Duffield Va 24244

F. Defendant No. 6

Name. Officer Ruley

Address. SWVRS 1037 Boontrail Rd
~~Duffield~~ Duffield Va 24244

G. Defendant No. 7 Southwest Va Regional Jail et al

Name. Southwest Virginia Regional Jail et al

Address. Southwest Va Regional Jail 1037 Boontrail Rd
Duffield Va ~~24244~~ 24244

5. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party? Each Plaintiff must be diverse from each Defendant for diversity jurisdiction.

Plaintiff No. 1: Kenneth Brown State of Citizenship: _____

Plaintiff No. 2: _____ State of Citizenship: _____

Defendant No. 1: Dr Shah State of Citizenship: \$100,000

Defendant No. 2: Dr. Shah's mental Health nurses State of Citizenship: \$100,000

Attach additional sheets of paper as necessary and label this information as paragraph 5. Check here if additional sheets of paper are attached. ☒

STATEMENT OF THE CLAIM

Describe in the space provided below the basic facts of your claim. The description of facts should include a specific explanation of how, where, and when each of the defendants named in the caption violated the law, and how you were harmed. Do not give any legal arguments or cite cases or statutes. Each paragraph must be numbered separately, beginning with number 6. Please write each single set of circumstances in a separately numbered paragraph.

6. On Dec 19 2023 I came to Jail
with in 2 week Dr Shah change the
dose of my meds welbutrin 300XL
I tried to go along.

March 13 2024 they move me to
Duffield Va

April 6 nurse Addington took my
meds for 30 day with in that
30 days I went and told Dr
Shah he gave me Efxier and

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Defendant 3. Nurse Addeington

Defendant 4. Nurse Carroll

Defendant 5. Nurse G. G. 95

Defendant 6. Officer Rulely

Defendant 7. SWVRJ

State of Citizenship 3. \$100,000.⁰⁰

State of Citizenship 4. \$100,000.⁰⁰

State of Citizenship 5. \$100,000.⁰⁰

State of Citizenship 6. \$100,000.⁰⁰

State of Citizenship 7. \$100,000.⁰⁰

Remron I filed sick calls and
Grievances I have copys of all of
them May 6 2024 Nurse Adlington
and the rest of the Nurses gave me
my medican welbutrin, Effxier, Remron
and my blood pressure meds July 3 2024
my welbutrin ran out As why it
was never filed put in sick calls
was told going to get fix have the
Grievances and Responses July 12
I was took out of my cell 4A 45
had Bottom bed because I am
handicapped have lots of pins an
Rods in me All this has cause
my Anxiety and PTSD to be worse
I'm not getting the right medical
Attion July 16, 2024 my blood pressure
and heart Rate where bad At midnight
the nurses that where working had
to give me 3 Nitros Baby Asprin
and Oxgen and call 911 I was took
to the hospital for Anxiety

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July 17 2024 I seen Dr Shah and told him About the lawsuit He had the never to Ask IF he gave my meds back would I retract my lawsuit I said no he gave me my welbutrin back but took me off my Effxier and Remeron and said he doesn't want to see me anymore to keep my welbutrin I have to see him every 3 month I dont know what I'm going to do

July 18 2024 I am brought back to 4A Pod But put in cell 16 on a top bunk or sleep in the floor with the Ants I was in Medical from July 12 2024, to July 18, 2024 in 8A pod cell 22 That was full of Black mold my health has went down hill we are Just a # here This has all took Place at

SWV R J

1037 Boon Trail Rd

Duffield Va 24244

Kenneth Brown

Attach additional sheets of paper as necessary and label them as Additional Facts and continue to number the paragraphs consecutively. Check here if additional sheets of paper are attached. ☒

REQUEST FOR RELIEF

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking.

Something needs to be done about how mental health is treated when you bring your on meds a assessment needs done and they cant take them for no reason people with handicaps should not be on top bunks the nurses are in control of our meds when a perscription needs refilling it need done before it runs out and they should not be able to crush our meds some of them are time ~~not~~ released The people in this suit need there licencee took We are prisoners we dont have to be treated like Anicimals I have thought so much about Killing myself but I will not punish her my wife but if I was single I wouldnt have this suit

The people name in this suit need to pay for what they have done because I'm sure I'm not the only one treated like this I have ask for \$ 700,000⁰⁰ yes that is a lot my heart damages my Anxiety worse my right leg with Pins and a rod in it sweller alful cant get help I should not be on a top bunk this is curle punishment I should be in a handicap cell

I want the meadia to know how All 3 SWURJ Run they Are privetly owned Abington, Haysi, Duffield
~~thank you~~ All they care About is money

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Thank you
Kenneth Brown

DEMAND FOR JURY TRIAL:

☒ YES

☐ NO

Signed this 23 day of July, 2024

Signature of Plaintiff No. 1

Kenneth Brown

Signature of Plaintiff No. 2

NOTE: All Plaintiffs named in the caption of the complaint must date and sign the complaint. Attach additional sheets of paper as necessary.